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Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket No. 2002N-0273, Substances Prohibited From Use in Animal Food or Feed

To Whom It May Concern,

I am writing this letter to express my concern regarding the FDA's proposed changes to the 1997 ruminant to ruminant feed ban. I believe that this change is not needed and I will be glad to explain my reasons.

First and what I believe to be most important, any change in the feed ban may result in renderers to cease pick-up of dead cattle. A rule change would cause increased cost in the collection of dead animals. Plus the increased health hazards become far more dangerous at land fills and on farms verses the removal of cattle brains and spinal cords from animal feeds. I believe the FDA has greatly underestimated the cost renderers will incur in removing the brain and spinal cord, plus depending on weather conditions extreme cold and extreme heat could make it difficult to remove the above mentioned. The economic impact would be substantial to the dairy and cattle industries. A revised rule would result in additional costs to the renderer that would have to be passed on to the farmer.

A recent study at Harvard University shows a low risk of BSE in the United States, due to current rules set by the FDA. Both BSE events were born in animals before the feed ban.

Regards,
Mark A. Smith
Area Manager
Baker Commodities Inc.
MAS

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